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And BizStratPlan Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FOCALPOINT INTERNATIONAL, INC.

Plaintiff,

vs.

DOM RUBINO CONSULTING SERVICES,
INC. and BIZSTRATPLAN INC.

Defendants.

Case No.: 2:18-cv-00236-APG-PAL

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
FOR DEFENDANTS' TO FILE AN
ANSWER AND COUNTERCLAIMS**

[SECOND REQUEST]

STIPULATION

Plaintiff FocalPoint International, Inc., and Defendants Dom Rubino Consulting Services, Inc., and BizStratPlan, Inc. (collectively, "Defendants"), by and through their counsel of record, hereby stipulate to extend the deadline for Defendants to file their answer and counterclaims in response to FocalPoint's Complaint. Specifically, the parties agree that Defendants' current May 21, 2018 deadline will be extended to May 29, 2018. This is the second request for extension of this deadline.

The parties have reached a tentative agreement on the disputed jurisdictional issues and are presently finalizing a stipulation and proposed order that will resolve that jurisdictional dispute, and allow the action to proceed here. Defendants desire to have that jurisdictional stipulation and

order submitted before answering the jurisdictional allegations in the complaint and asserting jurisdictional allegations in the counterclaims.

DATED this 21st day of May, 2018.

DATED this 21st day of May, 2018.

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By: /s/ Jacob Bundick

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ORDER

IT IS HEREBY ORDERED that Defendants' answer and counterclaims are due on May 29, 2018.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: May 22, 2018

Respectfully Submitted By:

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Brian Blakley

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